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March 17, 2019

Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

**In the Matter of**

**2018 Quadrennial Regulatory Review – Review of** )  
**the Commission's Broadcast Ownership Rules and** ) **MB Docket No. 18-349**  
**Other Rules Adopted Pursuant to Section 202 of** )  
**the Telecommunications Act of 1996** )

Dear FCC/Ajit Pai/Whomever it may concern,

This letter shall address my observations and opinions about FM/AM stations alone. Specific issues addressed will be the FCC Auction Process established in 1996, localism via radio, and the business opportunities slighted by the FCC ownership process of the past 33 years and how it relates to the founding principles of this great country.

My background: I was an animation director in Hollywood for a decade, and worked in broadcasting through those projects, I was a newspaper contributor and paste-up/layout/ad man, and in TV/radio repair for several years. I don't own a station, but am currently looking to submit for an FM allotment with hopes of getting a construction permit in the next years. Though I have no hands-on experience, I want to become an FM station owner in my area, so I have studied the laws and regulations, the technology and possibilities available to FM broadcasting for a couple years. Being a neophyte, I might have a unique perspective toward the radio station process that veterans of the process merely accept or ignore to address.

**The auction process** : the biggest hurdle to expansion of localism and business opportunities imposed by the FCC. In 1996 the internet was just becoming popular and accessible to the average American sans esoteric knowledge of computer programming and hardware. I was there, I experienced it first-hand as it grew and became what it is now, the capabilities and possibilities. Kudos to the FCC for embracing the internet and

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all it could deliver... in 1996. Oddly, the FCC seems stuck in 1996 with the auction process and all the limitations and incompatibilities it delivers to us today. Put bluntly—the auction process is antiquated. While it seemed a good idea, and it was fruitful to the pockets of the FCC, it has hindered the business of radio while funneling business opportunities into the hands of the richest and most affluent rather than allowing individualism and a chance for ANYONE (the “small guy”) to succeed in a perfectly lucrative and local business. The “small guy” will pay \$3000+, today, for an allotment which can then be taken away by a federal auctioning process that gives that allotment up to the bids of those with millions of dollars at their disposal; it robs the everyman of his effort to ferret out the placement and design of a valid FM station by turning it over to the whim of millionaires to pick-and-choose at their discretion via the auction, before possibly allowing it to fall like crumbs from an economic table down into the eager hands of a less-fortunate entrepreneur. Is this truly what could be called “fair” in any moral society? It is a process that funnels all opportunity upward, rather than to the passionate interest that began the FCC radio station paperwork process and application to create a business.

Repeal the FCC auction process for radio, I appeal.

Along with an inherent and lopsided flaw toward the richest, the auction process is now a hindrance to the opening of radio stations. It takes YEARS between auctions. If a person hopes to open a radio station in the USA, it could take ten years from conception until the station hits the airwaves. Why? This is gummy, clogged bureaucracy at it worst. Granted, in past decades it might have been necessary due to avoiding the airwaves from clashing and causing greater problems during expansion of the market, but the market is now close to saturation. There are few spaces for FM stations, and most are in rim-shot areas or completely rural areas where there should be little conflict with existing signals in the rural and urban areas. Modern technology allows anyone to quickly check feasibility of radio signals and how they propagate across the landscape. Once an allotment is granted, a construction permit should be immediately granted (for a fee) to the same applicant, and the radio station should be encouraged to get built and broadcasting ASAP. Sure, the FCC doesn't get to soak money from affluent interests casually perusing available opportunities in an unfortunate auction process, but it also stops TAX MONEY from being generated, incomes from being created and expanded, and it halts business opportunities from helping employ people and foster families and community integrity. Please consider what I just wrote. As a hopeful owner, I'd rather pay more to the FCC yearly in fees than wait a decade to get a station, if I am lucky. While the FCC is waiting, communities are losing opportunities to generate wealth and build business infrastructure.

The United States' Declaration of Independence and Constitution, including Bill Of Rights, were clearly written toward protection of the individual and individual rights to property and pursuit of business without undue government or political hinderance. If you openly assess the auction process, you will see that process is a hindrance and an

infringement on the individual. It is blatantly against the nature of the declaration and law of this land.

Although not written into the law and spirit of this nation, there is an idea ascribed on the heart of the people of America: first come, first serve. The FCC auction process for radio stations doesn't appeal to this basic equality. It says "first come, served after others with deeper pockets have their choice".

**Localism** : the heart of American community and culture. Due to the 1996 allowance for more stations owned by single entities, a shift in American culture has transpired. FM radio has been highly instrumental in this shift. Due to mass ownership by centralized groups (Cumulus, iHeart Radio, etc.), popular music and the pop music charts have been stagnating; large acts have now dominated the charts completely and the American musical scene, once filled with vibrant, demotic, acts and compositions, have now become a "cream" of record company darlings. Local musicians are ignored. The radio feeds back into the charts and are controlled by the dominance of a few centralized music programmers. Local stations outside that ownership feed off the charts the large entities fuel via national influence, and thus play only what is on the charts. Nothing "bubbles up" from the grassroots anymore—it is either made in a corporate echo chamber or it dies. This was an unintended effect of the 1996 rules, but it has clearly occurred. Radio has become "McRadio" across the fruited plain, and the common or local voice of music and expression in popular art has now been buried. Centralized dictates can easily become propagandized. Music has become more political, and there is no space for dissenting voices or alternate views due to how the radio and charts spiral around each other. Music, and culture dependent on music, has become greatly homogenized: diversity is dead.

If you look into radio stations in specific areas, using [Radio-Locator.com](http://Radio-Locator.com), you will see almost all markets now have a few iHearts, Cumulus stations, and K-Loves, and the remaining local stations tend to follow the formats of those titans. A few outliers remain in many markets, but they are vanishing and dwindling every year. Formulas rule. In the 70s and 80s, radio markets were diversified with dozens of formats—easy listening, jazz, classical, Americana, oldies, big band, R&B, soul, smooth jazz, etc.—but today there are only about five or six major formats, and several of those play nearly identical programming. Wider exposure to a greater variety of musical pieces has vanished.

The problem doesn't lie in the existence of iHeart, Cumulus, and other large musical providers, but rather that the ownership is by those very providers. For the diversity and health of local and regional programming and musicianship, I plead for the FCC to consider a change in rules that makes nearly all ownership local and impressing those large providers to become franchisees that sell their formatting to locally owned stations. This would increase incentive and competition while keeping radio stations locally owned and operated at the choice and interest of local people (audiences) rather than having an imposition of distant voices and control. I ask you to contemplate

allowing one or two stations in each large market to be owned by non-local businesses. All other stations must be owned by someone living, full-time, within the 40dBu signal range (25-75 miles, depending).

Local money is now being siphoned away from smaller communities into two or three large metropolitan cities where the controlling entities reside. Small communities lose money to larger cities through radio, and it drips the economy dry in rural and small-town America. Please consider that the mass ownership of radio present within smaller cities and markets causes difficulty of those economies to foster their own fiscal "ecosystem", moving money within the smaller community.

**Opportunities** : the first two subjects of this letter—auction process and localism—point to how many opportunities for individuals and local interests are quashed by the FCC rules and regulations imposed in 1996. On top of the cultural and economic impacts, there are the jobs lost to non-local corporate groups. Though the numbers of unemployed are negligible in the larger scheme, many jobs were dropped and lost at radio stations when groups purchased multiple stations in all parts of the USA. Centralized radio corporations gathered stations together into single buildings with single management crews and less radio personalities and less archivists or program directors. With decentralized control of radio, most stations would have their own, unique, offices and staffs, allowing for greater employment. A vibrant workforce of radio people has been whittled down to a small fraction of what it once was, since 1996.

In conclusion, I urge the FCC to consider dropping the auction process for a "first-come, first-serve" model in this era of reduced availability for new stations. I urge a reconsideration of the multiple-station ownership, reducing it to older rules imposed before 1996. I ask you to consider keeping ownership of stations within the 40dBu of the signal to promote localism within the economy, choice, and voice of the communities served by those stations. Thank you for reading and contemplating my words.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Steve Ressel", written in a cursive, flowing style.

Stephen W. Ressel